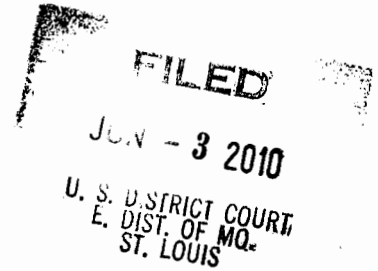


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION



UNITED STATES OF AMERICA,)
)
Plaintiff,)
) No.
vs.)
)
ANTHONY JOSEPH ADEWUNMI,)
CHRISTIAN JOEL JUAN, and)
PATRICIA DENISSE OLMOS,)
)
Defendants.)

4 : 1 0CR00291 JCH

INDICTMENT

COUNT I - CONSPIRACY TO COMMIT MAIL FRAUD AND WIRE FRAUD

Introduction

1. From October 10, 2000 to January 22, 2010, Defendant Anthony Joseph ("A.J.") Adewunmi was a licensed real estate broker with the State of Missouri. Adewunmi did business in the City of St. Louis and elsewhere within the Eastern District of Missouri as RE/MAX Associates and RE/MAX Associates Plus (the "RE/MAX entities").

2. From August 26, 2003 to September 30, 2008, Defendant Christian Joel Juan was a licensed real estate agent. Defendant Juan did business in the City of St. Louis and elsewhere within the Eastern District of Missouri and was affiliated with Defendant Adewunmi and the RE/MAX entities from August 26, 2003 until June 21, 2006.

3. From July 8, 2004 until September 30, 2006, Defendant Patricia Denisse Olmos was a licensed real estate agent. Defendant Olmos did business in the City of St. Louis and elsewhere within the Eastern District of Missouri and was affiliated with Defendant Adewunmi and the RE/MAX entities from June 28, 2005 until November 30, 2005. Prior to

becoming a real estate agent, Defendant Olmos worked for Defendant Adewunmi as an interpreter.

4. Defendant Adewunmi was a part owner of Cots Realty Investments, Inc., a Missouri Corporation ("Cots Realty").

5. Defendants Adewunmi, Juan and Olmos (collectively "Defendants") worked together on a number of real estate transactions between approximately September 1, 2003 and September 1, 2005.

6. In these transactions, described more particularly below, Defendants prepared applications for financing on behalf of the buyers which contained false, material statement about the buyer's ability to repay. Defendants used their knowledge and experience as real estate professionals and exploited the buyers' lack of financial sophistication and English-speaking ability to tailor their applications to be approved even though, in truth and fact and as Defendants well knew, the buyers could neither qualify for financing for the amounts they borrowed or service the debt they borrowed with their true income and other assets.

The Transactions

7. On June 10, 2005, an individual named A.M. purchased a property at 3818 Neosho, St. Louis, Missouri within the Eastern District of Missouri with the assistance of Defendants. A.M. provided copies of his true pay check stubs and federal W-2 tax forms to Defendant Olmos. Defendants then presented false tax forms and made false, material statements of fact on the Uniform Residential Loan Application submitted by A.R. to a mortgage company. These false statements included a false employer and overstated earnings.

8. On July 15, 2005, an individual named A.E. purchased a property at 9414

Theodosia, St. Louis, Missouri with the assistance of Defendants. A.E. was a house cleaner and had no pay check stubs or W-2 forms to provide to a potential lender. Defendant Juan assisted her in obtaining an identification and acted as a translator to A.E. during the purchasing process. Defendants presented false tax forms and made false, material statements of fact on the Uniform Residential Loan Application submitted by A.E. to a mortgage company. These false statements included a false employer and overstated earnings.

9. On August 17, 2005, an individual named A.D. purchased a property at 4718 Dahlia, St. Louis, Missouri within the Eastern District of Missouri with the assistance of Defendants from Cots Realty. A.D. provided Defendant Juan with tax records and pay check stubs. Defendants presented false tax forms and made false, material statements of fact on the Uniform Residential Loan Application submitted by A.D. to a mortgage company. These false statements included a false employer and overstated earnings.

10. On August 22, 2005, an individual named M.G. purchased a property at 3129 Osage, St. Louis, Missouri within the Eastern District of Missouri with the assistance of Defendants. M.G. provided Defendant Olmos with tax records and pay check stubs. Defendants presented false tax forms and made false, material statements of fact on the Uniform Residential Loan Application submitted by M.G. to a mortgage company. These false statements included a false employer and overstated earnings.

11. On August 29, 2005, an individual named R.M. purchased a property at 4230 Nebraska, St. Louis, Missouri within the Eastern District of Missouri with the assistance of Defendants from Cots Realty. R.M. provided Defendant Olmos with tax records and pay check stubs. Defendants presented false tax forms and made false, material statements of fact on the

Uniform Residential Loan application submitted by R.M. to a mortgage company. These false statements included a false employer and overstated earnings.

Object of the Conspiracy

12. Between on or about September 1, 2003 and continuing through on or about September 1, 2005 with the exact dates unknown to the Grand Jury, Defendants conspired to commit offenses against the United States, to wit: mail fraud and wire fraud.

Manner and Means of the Conspiracy

13. It was a part of the conspiracy that Defendants would work together on the foregoing transactions and, in addition, to representing the purchasers of the properties, arrange for the purchasers' financing through a mortgage company. The purchasers did not provide their financial information directly to the mortgage company but to Defendants.

14. It was a part of the conspiracy that Defendants would, instead of or in addition to the true financial information provided them by a purchaser, obtain or produce bogus tax records. Defendant would also falsely inflate the income of a purchaser on the Uniform Residential Loan Application they presented to the mortgage company on behalf of a purchaser.

15. It was a part of the conspiracy that Defendant would benefit, both through commissions paid to the RE/MAX entities and profits realized by Cots Realty through the sale of its properties, from their clients successful purchases of the properties.

Overt Acts of the Conspiracy

16. On or about September 1, 2003, Defendants prepared a Uniform Residential Loan Application and submitted it to a mortgage company on behalf of their client R.B.

17. On or about June 18, 2004, Defendants prepared a Uniform Residential Loan

Application and submitted it to a mortgage company on behalf of their client E.A.

18. On or about March 5, 2005, Defendants prepared a Uniform Residential Loan Application and submitted it to a mortgage company on behalf of their client G.R.

19. On or about June 10, 2005, Defendants prepared a Uniform Residential Loan Application and submitted it to a mortgage company on behalf of their client A.M.

20. On or about July 15, 2005, Defendants prepared a Uniform Residential Loan Application and submitted it to a mortgage company on behalf of their client A.E.

21. On or about August 17, 2005, Defendants prepared a Uniform Residential Loan Application and submitted it to a mortgage company on behalf of their client A.D.

22. On or about August 22, 2005, Defendants prepared a Uniform Residential Loan Application and submitted it to a mortgage company on behalf of their client M.G.

23. On or about August 29, 2005, Defendants prepared a Uniform Residential Loan Application and submitted it to a mortgage company on behalf of their client R.M.

Offense Conduct

24. Between on or about September 1, 2003 and on or about September 1, 2005, with the exact dates unknown, the defendants,

**ANTHONY JOSEPH ADEWUNMI,
CHRISTIAN JOEL JUAN, and
PATRICIA DENISSE OLMOS,**

did conspire to commit offenses against the United States, to wit: mail fraud in violation of Title 18, United States Code Section 1341 (Chapter 63) and wire fraud in violation of Title 18, United States Code Section 1343 (Chapter 63) and one or more of the defendants committed an act to effect an object of the conspiracy.

effect an object of the conspiracy.

All in violation of Title 18, United States Code Section 1349.

COUNTS II THROUGH VI (MAIL FRAUD)

25. The allegations contained in paragraphs 1 through 24 are hereby realleged and incorporated by reference.

26. Having devised a scheme and artifice to defraud lenders by means of false promises, pretenses and representations, the defendants

**ANTHONY JOSEPH ADEWUNMI,
CHRISTIAN JOEL JUAN, and
PATRICIA DENISSE OLMOS,**

for the purpose of executing the same, caused to be sent or delivered by means of the United States Postal Service and by means of a private commercial carrier, copies of the closing packet relating to fraudulently obtained financing for the following properties in the City of St. Louis within the Eastern District of Missouri:

Count	Address of Property	Date
II	3818 Neosho	June 10, 2005
III	9414 Theodosia	July 15, 2005
IV	4718 Dahlia	August 17, 2005
V	3129 Osage	August 22, 2005
VI	4230 Nebraksa	August 29, 2005

In violation of Title 18, United States Code Section 1341 and 2.

COUNT VII (FALSE STATEMENT)

27. The allegations contained in paragraphs 1 through 26 are hereby realleged and

incorporated by reference.

28. On or about August 17, 2005, within the Eastern District of Missouri, the defendants,

**ANTHONY JOSEPH ADEWUNMI,
CHRISTIAN JOEL JUAN, and
PATRICIA DENISSE OLMOS,**

did, for the purpose of obtaining a loan or advance of credit from a person, partnership, association or corporation with the intent that such loan or advance of credit shall be offered to or accepted by the Department of Housing and Urban Development, knowingly made a false statement, to wit: false statements about the employment, wage history, income and assets of A.D. relating to the financing of 4718 Dahlia, St. Louis, Missouri.

In violation of Title 18, United States Code Section 1010 and 2.

A TRUE BILL

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

Thomas C. Albus, #96250
Assistant United States Attorney